

1 Adam E. Polk (SBN 273000)
Simon Grille (SBN 294914)
2 Trevor T. Tan (SBN 280145)
Reid Gaa (SBN 330141)
3 **GIRARD SHARP LLP**
4 601 California Street, Suite 1400
San Francisco, CA 94108
5 Telephone: (415) 981-4800
Facsimile: (415) 981-4846
6 apolk@girardsharp.com
sgrille@girardsharp.com
7 ttan@girardsharp.com
8 rgaa@girardsharp.com

9 *Attorneys for Plaintiffs*

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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 BRAYDEN STARK and JUDD OOSTYEN, on
behalf of themselves and all others similarly
15 situated,

16 Plaintiffs,

17 v.

18 PATREON, INC,

19 Defendant.

Case No. 3:22-cv-03131-JCS

**DECLARATION OF TREVOR T. TAN IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

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28 **DECLARATION OF TREVOR T. TAN IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION
TO FILE UNDER SEAL
CASE NO. 3:22-cv-03131-JCS**

I, Trevor T. Tan, hereby declare under penalty of perjury:

1. I am an attorney at the law firm of Girard Sharp LLP and represent Plaintiffs Brayden Stark and Judd Oostyen (“Plaintiffs”) in this action. I have personal knowledge of the facts stated in this declaration and, if called to do so, could and would testify competently thereto.

2. I submit this declaration in support of Plaintiffs’ Administrative Motion to File Under Seal.

3. Attached to the Administrative Motion to File Under Seal are the following:

Document	Description	Designating Party
Motion	Plaintiffs’ Memorandum of Points and Authorities in Opposition to Defendant Patreon Inc.’s Motion for Summary Judgment on First Amendment Grounds: Page 3, line 8; Page 17, lines 7-9	Plaintiffs
Exhibit B	Deposition Transcript of Judd Oostyen: Page 88, line 25 – Page 90, line 13	Plaintiffs

4. Plaintiffs’ Administrative Motion to File Under Seal describes the nature of what Plaintiffs request the Court maintain under seal. Each of the references and portions of documents sought to be sealed contains highly confidential information that, if sealing were denied, would jeopardize the legitimate privacy interests of Plaintiffs.

5. Plaintiffs seek to seal information detailing private content they consumed on Patreon’s website. This information is sufficiently detailed such that, if publicly disclosed and viewed by a third party, the subject matter of this private content would be revealed.

6. The subject matter of the content Plaintiffs seek to seal is inherently private and is information Plaintiffs would not voluntarily disclose to the public. The sensitive nature of this information renders it susceptible to being used to gratify private spite or produce a libelous statement.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of December, 2023, in San Francisco, CA.

Trevor T. Tan

CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record. I also certify that I caused the under seal documents to be served on counsel *via electronic mail*.

/s/ Trevor T. Tan

Trevor T. Tan